

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

RAS CITRON, LLC

130 Clinton Road, Suite 202

Fairfield, New Jersey 07004

Telephone Number: 973-575-0707

Attorneys for Secured Creditor

Harold N. Kaplan (HK-0226)

In Re:

ANGELINA REDDING,

Debtor.

Case No.: 17-20852-JNP

Chapter: 13

Hearing Date: January 22, 2019

Judge: Jerrold N. Poslusny Jr.

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY

HEARING DATE AND TIME:

January 22, 2019 at 10:00 a.m.

**ORAL ARGUMENT IS REQUESTED IN THE EVENT
OPPOSITION IS TIMELY FILED**

TO:

<i>Debtor(s)-</i> Angelina Redding 315 W. Wildwood Ave Wildwood, NJ 08260	<i>Co-Debtor-</i> John G. Redding 315 W. Wildwood Ave Wildwood, NJ 08260	<i>Debtor's Attorney-</i> Brad J. Sadek Sadek and Cooper 1315 Walnut Street Ste 502 Philadelphia, PA 19107	<i>Trustee-</i> Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002	<i>U.S.Trustee</i> U.S. Trustee. US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102
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PLEASE TAKE NOTICE that on January 22, 2019 at 10:00 a.m., or as soon thereafter as counsel may be heard, RAS CITRON, LLC, attorneys for Wells Fargo Bank, National Association, successor by merger to Ocwen Loan Servicing, LLC as servicer for Wells Fargo Bank Minnesota, National Association, as Trustee f/k/a Norwest Bank Minnesota, National Association as Trustee for Renaissance HEL Trust 2004-3, the within creditor ("Creditor"), shall move before the Honorable Jerrold N. Poslusny Jr., United States Bankruptcy Judge, at Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Camden, N.J. 08101, Courtroom 4C for an Order pursuant to 11 U.S.C. §362(d)(1) and 11 U.S.C. § 1301 granting such Creditor relief from automatic stay or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT, US Bankruptcy Court,, District of New Jersey, PO Box 2067, Camden, NJ 08101**, and simultaneously served on Secured Creditor's counsel, **RAS CITRON, LLC, 130 Clinton Road, Suite 202, Fairfield, New Jersey 07004**, as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED: December 27, 2018

RAS Citron, LLC
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By: /s/ Harold N. Kaplan
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